

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LKRB Industries, LLC,

Plaintiff,

v.

Xuzhouaiyaxundianzishangwuyouxiangongsi
(d/b/a TJOY US) AND THE OTHER
INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE “A”

Defendants.

Case No. 2:24-cv-1601

JURY TRIAL DEMANDED

**NOTICE OF VOLUNTARY DISMISSAL OF DEFENDANT NO. 38
(DINGXINGMINGRUI SHENZHEN E-COMMERCE CO.,LTD D/B/A TOPTHRIVING;
SELLER ID: A3EQ9YSF2FB8FU)**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff LKRB Industries, LLC d/b/a Happy Grandpa (“Plaintiff”), by and through its undersigned counsel, hereby submits this Notice of Voluntary Dismissal of all claims against Defendant DingXingMingRui Shenzhen E-Commerce Co.,Ltd d/b/a TopThriving, identified in Schedule “A” to the Complaint as Defendant No. 38 with Amazon Seller ID: A3EQ9YSF2FB8FU (the “dismissed Defendant”) from this action WITH PREJUDICE with each party to bear its own costs, expenses, and attorneys’ fees. The dismissed Defendant and Plaintiff have entered into a Settlement and Release Agreement effective January 14, 2025. The dismissed Defendant has not answered Plaintiff’s Complaint nor filed a responsive pleading. Accordingly, the dismissed Defendant may be voluntarily dismissed and without a court order under Rule 41(a)(1)(A)(i).

Respectfully submitted,

Dated: January 17, 2025

By: /s/ John A. Schwab
JOHN A. SCHWAB, ESQUIRE
PA I.D. No.: 89596

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